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November 9, 2021

Hon. J. Paul Oetken United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Marco Segovia-Landa, Case No.: 20-CR- 287 (JPO) Letter Motion Adjournment

Dear Judge Oetken:

I am requesting that the Court adjourn Mr. Segovia Landa's appearance scheduled for tomorrow, November 10, 2021. The Government, this past week, presented Mr. Segovia Landa with a new plea offer.

Mr. Segovia Landa's primary language is Spanish and the plea agreement and accompanying documents must be translated into Spanish to insure he fully comprehends them. Unfortunately, due to the limited video and phone slots available at MDC I was only able to obtain a 30-minute slot for today.

Therefore, I am requesting an adjournment until the week of December 13 or the weeks after. I will not be in New York from November 19, 2021, until December 10, 2021. I am also requesting you direct the Bureau of Prisons to provide and additional 90-120 minutes over the next three weeks for me to meet with the defendant.

The parties jointly request an exclusion of time under the Speedy Trial Act until the new date for the plea proceeding because the ends of justice served by holding the plea proceeding at a future date outweigh the best interests of the public and the defendant in a speedy trial. The adjournment will afford the defendant additional time to discuss with his counsel the appropriateness of a pretrial resolution. See 18 U.S.C. § 3161(h)(7)(A). My best wishes to the Court and Chambers Staff for a Happy Holiday Season.

Sincerely Yours,

David Chidekel

Via ECF - To Registered Participants

## Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) on November 9, 2021.

## /s/ David M. Chidekel

Granted. The November 10, 2021 pretrial conference is adjourned to December 16, 2021, at 11:00 am.

The Court hereby excludes time through December 16, 2021, under the Speedy Trial Act, 18 USC 3161(h)(7)(A), finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial.

The BOP is directed to facilitate a 120-minute period of time within the next three weeks in which counsel can speak to defendant via telephone. So ordered: November 10, 2021

J. PAUL OETKEN

United States District Judge